

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:)		
)		
THIMMONTHY GORDON)	CHAPTER:	13
3515 APRIL LANE)	CASE NO.:	18-00145
MURFREESBORO, TN 37130)	JUDGE:	WALKER
SSN : XXX-XX-5905)		
Debtor)		
)		
KESHA GORDON			
1426 SUNRAY DRIVE			
MURFREESBORO, TN 37127			
SSN : XXX-XX-4717			
Joint Debtor			

DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM STAY

The Debtors, by and through counsel, Rothschild and Ausbrooks, PLLC, respectfully respond to the Motion for Relief from Stay as follows:

- 1) The Debtors fell behind on their rent due to several unforeseen medical expenses. The Joint Debtor suffered a knee injury and their daughter had to have emergency oral surgery. The Debtors propose to satisfy the arrearages in the amount of \$1,904.90 on June 15, 2018 and are prepared to pay rent for July, 2018 in a timely manner.

PREMISES CONSIDERED, Debtors ask the Court to deny the Motion for Relief from Stay.

Respectfully submitted,

/s/ Alex Koval
Alex Koval
ROTHSCHILD & AUSBROOKS, PLLC
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CERTIFICATE OF SERVICE

I certify that on this 18th day of June, 2018, I served a copy of the foregoing in the following manner:

Email by Electronic Case Noticing to:

Asst. U.S. Trustee; Henry E. Hildebrand, III, Chapter 13 Trustee

By U.S. Postal Service, postage prepaid to:

The Debtors at the above addresses; and to Todd A. Bricker, 330 Commerce Street, STE 110, P.O. Box 198985, Nashville, TN 37219-8985.

/s/ Alex Koval

Alex Koval

3 TOTAL USPS MAILINGS: \$3.00